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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$49,900.00 IN  
U.S. CURRENCY,

15 Defendant.  
16

2:22-MC-00291-DAD-CKD

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant April  
18 Medal (“claimant”), by and through their respective counsel, as follows:

19 1. On or about June 30, 2022, claimant filed a claim in the administrative forfeiture  
20 proceedings with the Drug Enforcement Administration with respect to the Approximately \$49,900.00 in  
21 U.S. Currency (hereafter “defendant currency”), which was seized on April 21, 2022.

22 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit  
23 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  
24 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other  
25 than the claimant has filed a claim to the defendant currency as required by law in the administrative  
26 forfeiture proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the  
3 parties. That deadline was September 28, 2022.

4 4. By Stipulation and Order filed October 3, 2022, the parties stipulated to extend to November  
5 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
7 forfeiture.

8 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
9 to December 12, 2022, the time in which the United States is required to file a civil complaint for  
10 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
11 currency is subject to forfeiture.

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6. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to December 12, 2022.

Dated: 11/28/22

PHILLIP A. TALBERT  
United States Attorney

/s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

Dated: 11/28/22

/s/ Thomas Chapin  
THOMAS CHAPIN  
Attorney for potential claimant  
April Medal  
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(Authorized by phone)

IT IS SO ORDERED.

Dated: November 30, 2022

Dale A. Drogel  
UNITED STATES DISTRICT JUDGE